STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING

JENNIFER M. GRANHOLM
GOVERNOR

STEVEN E. CHESTER
DIRECTOR

August 11, 2009

VIA E-MAIL and U.S. MAIL

Mr. James Hahnenberg
United States Environmental Protection Agency
Region 5
77 West Jackson Boulevard (SR-J6)
Chicago, Illinois 60604-3590

Dear Mr. Hahnenberg:

SUBJECT: North Bronson Industrial Area Superfund Site

During the March 17, 2009, meeting in Bronson, Mr. Leo Brausch, as spokesperson for the potentially responsible party (PRP) group for the North Bronson Industrial Area (NBIA) Superfund site, addressed several topics relative to the NBIA, and made proposals for proceeding on the project. This letter will address the subject of the Mixing Zone Determination (MZD) and Groundwater to Surface Water Interface (GSI) compliance monitoring. This letter has been prepared in consultation with the United States Environmental Protection Agency (USEPA). This letter is addressed to you for eventual transmittal to the PRPs.

To briefly summarize, the following information was presented at the meeting. The PRPs will be able to comply with all of the September 16, 2008, MZD values with the exception of the chronic values for nickel, cadmium, and chromium VI. If the entire length of the estimated venting plume along County Drain #30 could be used for MZD compliance demonstration, rather than only that portion of the plume where these contaminants are anticipated to be exceeded, your clients would be able to demonstrate compliance. Mr. Brausch requested that the Michigan Department of Environmental Quality (MDEQ) advise the PRP group whether this was acceptable.

Monitoring wells for demonstration of GSI compliance must be placed in areas expected to exceed the specific contaminant limit in question. Therefore, the PRPs cannot make a demonstration of compliance with the GSI using data from wells installed along the entire length of the venting facility plume, unless it is realistically anticipated that exceedances for that contaminant likely would occur along the entire plume face.

The PRPs have the option of performing additional groundwater characterization work at the GSI to more specifically delineate that portion of the venting plume that is above criteria, specific to each contaminant of concern. The MZD could then be calculated based on a more specific discharge volume. The PRPs must understand that this may

have no impact on the calculated chronic values, or it could change them to either more restrictive or less restrictive values. In other words, there is no guarantee that the PRPs will be as satisfied with these results than with the current values in the September 2008 MZD.

In any event, if the PRPs elect to exercise this option, they will have to characterize the chemical constituents of the aquifer, vertically and horizontally, sufficiently to demonstrate the interval(s) where the generic GSI criteria are exceeded. Once this has been accomplished to the satisfaction of the MDEQ Remediation and Redevelopment Division (RRD), we can process mixing zone based criteria based upon the specific venting plume on a chemical-specific basis. If the NBIA PRPs decide that they want to proceed with this exercise, advise that they consult with the RRD on preparation of a work plan that will be sufficient to satisfy the requirements of Part 201[1] to define the eastern and western extents of the groundwater plumes from the lagoon areas; or, if they prefer, the eastern and western extent of the plume venting from the two lagoon areas combined.

Please contact Mr. Charles Graff at 517-335-2596 if you have questions or would like to discuss any portion of this letter.

Sincerely,

Dana W. Devantier

for Deborah Larsen
Project Manager
Specialized Sampling Unit
Superfund Section
Remediation and Redevelopment Division

cc: Mr. Leo Brausch, P.E.
Mr. Charles Graff, MDEQ
NBIA file

[1]Part 201, Environmental Remediation, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended.